

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-1776 (JRT/JFD)

This Document Relates to:

ALL CONSUMER INDIRECT
PURCHASER ACTIONS

**DECLARATION OF MARC H.
EDELSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND LITIGATION EXPENSES**

I, Marc H. Edelson, hereby declare and state as follows:

1. I am a partner of Edelson Lechtzin LLP. I submit this declaration in support of Plaintiffs' Motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action"). I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Counsel in this matter for Plaintiffs.

3. Attached hereto as **Exhibit 1** is my firm's total hours and lodestar, computed at current rates, for the period from July 1, 2021 through December 31, 2022. The total number of hours spent by my firm from July 1, 2021 through and including December 31, 2022 was 55.9 with a corresponding current lodestar of \$19,565.00.¹ This summary was prepared from contemporaneous, daily time records regularly prepared and

¹ Such time does not include any time expended in completing this declaration.

maintained by the firm. The lodestar amount reflected in **Exhibit 1** is for work assigned by Plaintiffs' Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the Class/Plaintiffs during the aforementioned time periods. In preparing this time, I followed Co-Lead Counsel's protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing Plaintiffs in the Action, from July 1, 2021 through December 31, 2022 my firm did the following: document review. The hourly rates for the attorneys and professional staff in my firm reflected in **Exhibit 1** are the usual and customary hourly rates charged by my firm in similar complex litigation matters.

4. From July 1, 2021 through December 31, 2022, my firm has expended a total of \$0.00 in unreimbursed costs and expenses in connection with the prosecution of the Action. These costs and expenses are set forth in the chart attached as **Exhibit 2** and reflected on the books and records of my firm. The costs and expenses from July 1, 2021 through and including December 31, 2022 were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 17, 2023 in Newtown, Pennsylvania.

s/ Marc H. Edelson
Marc H. Edelson

EXHIBIT 1

FIRM NAME

Reported Hours and Lodestar for the Entire Case Period

Inception of the case through December 31, 2022

Timekeeper	Professional Status	Hours	Current Rate	Total Lodestar
Shoshanna Savett	A	55.9	\$350	\$19,565.00
Grand Total				

Reported Hours and Lodestar Following the JBS Settlement

July 1, 2021 through December 31, 2022

Timekeeper	Professional Status	Hours	Current Rate	Total Lodestar
Shoshanna Savett	A	55.9	\$350	\$19,565.00

Exhibit 2

FIRM NAME

Expenses Incurred between July 1, 2021 through December 31, 2022

Expense Category	Amount Incurred
Electronic Research (Lexis/Westlaw/PACER)	
Court Costs – Filing Fees	
Litigation Fund Contribution	
Express Delivery/Messengers	
Photocopies – In House	
Photocopies - Outside	
Postage	
Service of Process Fees	
Telephone / Fax	
Transportation / Meals / Lodging	
Experts/Consultant Fees	
Court Reporter Service/Hearing Transcript Fees	
TOTAL EXPENSES	\$0.00